

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

~~SEALED~~ Unsealed 10/13/06

UNITED STATES OF AMERICA,

Plaintiff

v.

TANYA BOWIE,

Defendant.

Filed Ex Parte and Under Seal

Criminal Action No. 06-20-SLR

**MOTION FOR REVOCATION OF PRETRIAL RELEASE**

NOW COMES the United States of America, by and through its undersigned attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Beth Moskowschnoll, Assistant U.S. Attorney, and hereby respectfully moves, pursuant to 18 U.S.C. § 3148, for the revocation of the defendant's pretrial release status. This motion is based upon the following facts:

1. The defendant appeared for her initial appearance before the Magistrate Judge on March 8, 2006, and was placed on pretrial release supervision.
2. On August 16, 2006, the defendant appeared before this Court and entered a guilty plea to two counts of passing counterfeit securities in violation of 18 U.S.C. § 513(a). The Court permitted the defendant to remain on release status pending sentencing.
3. One of the conditions of the defendant's release was that she not commit another Federal, state or local crime. It is this condition that the United States respectfully submits the defendant has violated.
4. A fraud investigator for one of the victims of the crime to which the defendant pleaded guilty, the Marmaxx Corporation, notified myself and the case agent, U.S. Secret Service

Special Agent Michael Armstrong, that she had identified several additional counterfeit checks that had been passed by the defendant at Marshalls stores since the defendant entered her guilty plea. In passing these additional counterfeit checks, the defendant used the names "Aiana Yates" and "Stormi Young." The fraud investigator identified the checks as having been written by the defendant based on the defendant's distinctive handwriting.

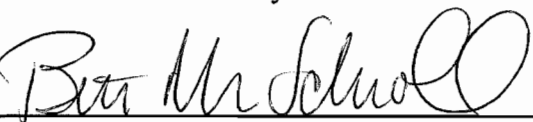
5. On September 27, 2006, the fraud investigator forwarded the following items to Special Agent Armstrong and me: (a) a photograph of the defendant writing a check at a Marshalls store on September 10, 2006, the same date that "Stormi Young" passed three counterfeit checks at that Marshalls store; and (b) photographs of the defendant in a Marshalls store on August 12, 2006, the same date that "Aiana Yates" passed two counterfeit checks at that Marshalls store.

6. Both the fraud investigator and Special Agent Michael Armstrong are prepared to testify to the facts contained in this motion. The evidence supporting this motion has been sent to the U.S. Probation Office.

WHEREFORE, for all the foregoing reasons, the United States respectfully requests that a warrant be issued for Tanya Bowie and that she appear before the Court for a Revocation Hearing to determine whether she is in violation of the conditions of her release.

Respectfully submitted,

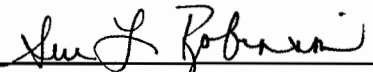
COLM F. CONNOLLY  
United States Attorney

BY:   
Beth Moskow-Schnoll  
Assistant United States Attorney

Dated: September 27, 2006

**ORDER**

Considered and so ordered this 10th day of October, 2006.

  
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Honorable Sue L. Robinson  
Chief U.S. District Judge